

Section 6

Public Agency Activities

6.1 Purpose

The permittees recognize the potential impacts, both positive and negative, that municipal activities can have on stormwater quality. The Public Agency Activities program discussed herein is directed at reducing the potential for negative stormwater quality impacts from activities such as municipal landscape maintenance, and implementing other municipal activities that may have a beneficial impact, such as street sweeping and storm drain cleaning. The Public Agency Activities program specifically excludes municipal activities and discharges that are covered under a separate NPDES permit, such as publicly owned treatment works.

6.2 Public Agency Program

The Public Agency Activities program element is organized into seven program areas. Each of these elements is discussed in the following sections.

6.2.1 Sewage Systems

Sewage spills can be a major source of pollution, especially if the discharge reaches the storm drain system or receiving water. Accordingly, the goal for all permittees is to prevent sewage spills from entering the storm drain system to the MEP. To address this goal, the permittees established a *Sanitary Sewer Overflow Unified Sewage Response Plan* (July 1, 2003), which establishes overflow response procedures in case of a spill.

On May 2, 2006, the SWRCB adopted general waste discharge requirements for all publicly owned sanitary sewer collection systems in California with more than one mile of sewer pipe. The goal of this General Permit is to provide a consistent statewide approach for reducing Sanitary Sewer Overflows (SSOs). Key requirements contained in the permit include:

- In the event of an SSO, all feasible steps should be taken to control the overflow and prevent untreated wastewater from entering storm drains and receiving waters;
- If an SSO occurs, it must be reported to the state using an online reporting system developed by the SWRCB; however, if the spill is greater than 1000 gallons it must also be reported to the Office of Emergency Services; and
- All publicly owned collection system agencies with more than one mile of sewer pipe in the state must develop a Sewer System Management Plan according to the requirements specified in the permit.

To ensure consistency, during the next permit cycle the Management Committee will review its *Sanitary Sewer Overflow Unified Response Plan* to verify that the plan is consistent with the new general waste discharge requirements for SSOs.

6.2.2 Maintenance Areas and Materials Storage Areas

The goal of this program element is to eliminate non-stormwater discharges from maintenance and material storage areas exposed to rainfall or subject to stormwater run-on. This element only addresses those facilities and activities that are exposed to rainfall or stormwater runoff. The targeted municipal facilities and activities include the following:

- Facilities used for servicing, fueling, or washing vehicles or equipment. Most often, these facilities are found at corporation yards, however they may also be found at local or regional parks, golf courses, fire stations, police stations, and other areas.
- Outdoor storage areas for chemicals, materials, and wastes associated with municipal activities, e.g., at corporation yards, parks, golf courses, and fire stations. Chemicals, materials, and wastes of concern include, but are not limited to vehicle fuels; fluids and wash waters; paving and base materials; pesticides, herbicides, and fertilizers; pool chemicals; algaecides; and materials recovered through household hazardous waste collection programs or spill response (HazMat).

The MAPPS training program focuses on reducing or eliminating pollution from corporation yards, and addresses other municipal activities such as developing site-specific plans for maintenance and material storage areas. At a minimum, these site-specific plans include the following:

- A site map showing pertinent site features and storage areas, runoff patterns, and drainage facilities;
- A discussion of potential sources of pollution;
- A list of applicable BMPs;
- Contact information for the person or position responsible for the site; and
- The name and function of additional staff responsible for implementing BMPs (that will be targeted for training).

Generic BMPs and plan elements can be used for activities that are performed at more than one site, but each site must be evaluated separately. At least annually, the site-specific plans are reviewed and updated as necessary to reflect current site conditions.

The permittees have also developed a model inspection checklist, based on the checklist developed for the MAPPS program, and inspect each facility at least once each year. Applicable portions of the model checklist are incorporated into site-specific checklists by each permittee. The inspection results are reviewed and signed by the person responsible for the site and the signed inspection forms are kept on file by the permittee. Staff targeted for training, as noted in the site-specific plans, receive appropriate training.

6.2.3 Landscape Maintenance

The goal of this program element is compliance with good housekeeping practices and pollution prevention BMPs for landscape and waterbody maintenance activities. This element specifically addresses the following outdoor landscape maintenance activities:

- Landscape irrigation;
- Storage and disposal of landscape materials and wastes;
- Use of pesticides, herbicides, and fertilizers;
- Maintenance of public waterbodies, including swimming pools, lakes, ponds, and fountains; and
- Pavement and walkway cleaning (pressure washing) and related discharges.

All of these maintenance activities have a potential for contributing pollutants to stormwater. However, pollutant discharges can be reduced or eliminated to the MEP by developing and implementing good housekeeping practices and other pollution prevention BMPs.

Previously, each permittee reviewed, and if necessary modified, maintenance practices used at parks and recreation facilities and public waterbodies to include stormwater pollution prevention methods. Each permittee has also required employees and contractors to comply with state regulations for pesticide use and applicator licensing and certification.

To ensure that maintenance staff is familiar with, understands, and implements appropriate good housekeeping practices and pollution prevention BMPs, the Management Committee developed BMP fact sheets to cover landscape and waterbody maintenance activities. The fact sheets are reviewed periodically by maintenance staff during tailgate meetings. Maintenance staff receives training as outlined in Section 6.2.6.

6.2.4 Storm Drain Systems

Each permittee inspects all of their inlets, open channels, and basins at least once during each reporting year and cleans those facilities where the inspection reveals one or more of the following conditions:

- 1) The sediment/debris storage volume is 40 percent or more full;
- 2) There is evidence of an illegal discharge; or
- 3) Accumulated sediment or debris impairs the hydraulic function of the facility.

Each inspection is documented and each permittee provides inspection and cleaning summaries to the Principal Permittee for inclusion in the annual report.

The permittees have developed a BMP fact sheet for drainage facility inspection, cleaning, and debris disposal. The BMP fact sheet is reviewed by all inspection and cleaning staff as described below and drainage facility inspection and maintenance staff receives training.

6.2.5 Streets and Roads

The Management Committee has incorporated road construction BMPs into construction specifications that are included in the contract documents for each applicable project. As contractors review the contract documents and prepare bid packages, these specifications provide a reminder of specific BMPs and practices that must be implemented and provide a separate enforcement mechanism for permittees to implement.

Because road maintenance BMPs may not receive the same recurring scrutiny by municipal maintenance crews, the Management Committee prepared a road maintenance BMP fact sheet that can be reviewed during "tailgate" safety meetings. The fact sheet addresses typical road maintenance activities such as saw cutting, paving, slurry/fog sealing, painting and striping, and pavement grinding. Road maintenance staff also receives training as outlined in Section 6.2.6.

The permittees will continue street sweeping according to the performance commitments outlined below. The street sweeping commitments apply to areas where there is sufficient continuous curb and gutter to justify street sweeping. Street sweeping does not occur in areas that do not have significant continuous curbs and gutters.

6.2.6 Municipal Activities Pollution Prevention Strategy (MAPPS) Training

Table 6-1 summarizes the content of the current MAPPS online training program. These online training modules are supplemented by field training which is offered once each year.

Table 6-1. Municipal Activities Pollution Prevention Strategy Training Modules	
Field Maintenance	
Construction Inspection	
Industrial/Commercial Inspection	
General Stormwater Training	
WQMP Training	

The Training Subcommittee regularly reviews, and, as needed, revises the MAPPS training program to provide a more thorough overview of all stormwater program

areas. The Training Subcommittee will continue to review and revise this training as needed during the next permit term. When developing major revisions to the MAPPS training program, the Training Subcommittee seeks input and coordination from the various intra-agency departments involved in the stormwater program.

6.2.7 Training

Permittee staff conducting the public agency activities described in this section need training to effectively incorporate stormwater pollution prevention practices. For example, landscape maintenance staff needs to learn how to properly store and dispose of landscape wastes and how to develop effective irrigation schedules. All permittee staff conducting public agency activities is targeted for stormwater-specific training and education. Targeted staff includes those from departments and programs such as public works, parks and recreation, community services, and maintenance.

The targeted staff receives general stormwater training and task-specific education and coordination that introduce staff to basic stormwater concepts including regulations, pollutants of concern, potential sources, BMPs, and general program activities. The MAPPS training program (see above) is the key method used to provide general stormwater training. The online training is supplemented by various other training efforts, including live presentations, on the job site visits and tailgate meetings by the permittees. For those already trained, refresher training is provided at least once during the permit term to keep staff up-to-date. Training and education activities are documented and reported annually to the principal permittee.

6.3 Performance Commitments

The permittees propose to implement the following performance commitments to implement the program elements established to address public agency activities.

- 6-1. To ensure that contract staff, who perform public agency activities identified by this section, receives the same or equivalent education and training as permittee staff, each permittee will incorporate training requirements into all contracts.
- 6-2. Each permittee will continue, to the MEP, to prevent sewage spills from reaching a receiving water, through timely response, containment, and clean-up. The Management Committee will review its draft *Sanitary Sewer Overflow Unified Sewage Response Plan* to update it as needed and ensure that the Plan is consistent with the state's general waste discharge requirements for SSO's.
- 6-3. Each permittee shall develop and maintain site-specific pollution prevention plans for each maintenance or material storage area. Where practical, plans will be retained on site at all times. A sign indicating where the plan is located will be provided at all areas for which plans are located off-site.

- 6-4. For maintenance and material storage areas, the Management Committee will review and revise, as needed, the model inspection checklist. The MAPPS checklist may be used as a starting point.
- 6-5. Each permittee will perform annual inspections of each outdoor maintenance and materials storage area.
- 6-6. Site-specific plans prepared for maintenance and material storage areas will list key staff for the site; site-specific plans will be reviewed at least once per year.
- 6-7. The Management Committee will review and, as needed, revise BMP fact sheets for landscape and waterbody maintenance activities.
- 6-8. Landscape and waterbody maintenance staff will review the current BMP fact sheet at least once per year as part of their regular "tailgate" safety meetings.
- 6-9. Each permittee will inspect all of inlets, open channels, and basins associated with their storm drain systems at least once during each reporting year.
- 6-10. Each permittee will clean those storm drain facilities where the inspection reveals one or more of the following conditions:
 - a. The sediment/debris storage volume is 40 percent or more full;
 - b. There is evidence of illegal discharge; or
 - c. Accumulated sediment or debris impairs the hydraulic function of the facility.
- 6-11. Each storm drain system inspection will be documented and each permittee will provide inspection and cleaning summaries to the Principal Permittee for inclusion in the annual report.
- 6-12. The Management Committee will develop a BMP fact sheet for storm drain cleaning and maintenance activities.
- 6-13. The storm drain system BMP fact sheet will be revised, as needed, and reviewed at least once per year by storm drain inspection and maintenance staff as part of their regular "tailgate" safety meetings.
- 6-14. Each permittee will incorporate road construction BMPs into the construction specifications that are included in the contract documents let for bid on each applicable project.
- 6-15. The Management Committee will review and revise, as needed, the road maintenance BMP fact sheet.

- 6-16. The road maintenance BMP fact sheet will be reviewed by maintenance staff at least once per year.
- 6-17. Each Co-Permittee will sweep at least 75 percent of public streets with curb and gutter at least once per year with more frequent sweeping in areas known to require more frequent sweeping or where problems have been reported.
- 6-18. The Training Subcommittee will review, and revise as necessary, the MAPPS training materials to keep them up to date with current practices and requirements.
- 6-19. Each permittee will identify key staff involved in sewage system maintenance, storm drain system inspection and maintenance, landscape maintenance, road and street maintenance, and key staff at maintenance and storage facilities and provide general stormwater training using a online training modules (MAPPS). Training materials will be updated or supplemented as needed to facilitate information sharing. New employees will be trained at the next scheduled course offering or within six months of starting, whichever occurs first. Refresher training will be provided at least once during the permit term for staff that has already received the basic training course materials.
- 6-20. Staff will be provided sufficient training to facilitate implementation of stormwater program procedures applicable to public agency facilities.
- 6-21. Each permittee will document and report annual training, education, and coordination activities to the principal permittee in the MS4 Solution database.